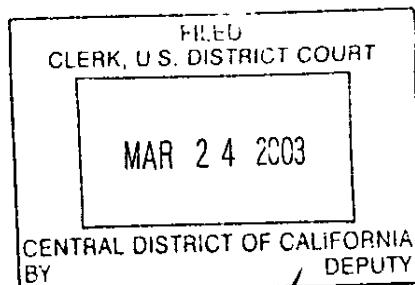


GOLDSMITH & HULL, P.C. Our File No. 10201274
Scott M. Gitlen (BN 94596)
18425 Burbank Boulevard, Suite 615
Tarzana, CA 91356-2821
(818) 708-2585
FAX (818) 996-4537

Attorneys for Plaintiff
United States of America



P. Sene

20 MAR 21 PH 2:49
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES, CALIFORNIA

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

2017 CIVIL ACTION NO. 17-CV-00001
UNITED STATES OF AMERICA,
Plaintiff,
vs.
HI-TECH DESIGN KITCHEN AND
INTERIORS, a California corporation;
KAMBAKHSH REZAI aka KAMBAKHAH
REZAI; and MINOO NEJAD BAKHSH aka
M.N. BAKHSH aka MINOO NEJAD REZAI,
Defendant(s).

} Case No. CV02-7168 GAF (Ex)
} STIPULATION FOR ENTRY OF
} CONSENT JUDGMENT

HI-TECH DESIGN KITCHEN AND
INTERIORS, a California corporation;
KAMBAKHSH REZAI aka KAMBAKHAH
REZAI; and MINOO NEJAD BAKHSH aka
M.N. BAKHSH aka MINOO NEJAD REZAI,

Defendant(s).

Plaintiff UNITED STATES OF AMERICA having filed its Complaint herein, and defendants HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation; KAMBAKHSH REZAI aka KAMBAKHAH REZAI; and MINOO NEJAD BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI having consented to the making and entry of this Judgment without trial, HEREBY AGREE AS FOLLOWS:

FURTHERMORE, Cross-complainants HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation and KAMBAKHS REZAI aka KAMBAKHAH REZAI; and Cross-defendant MINOO NEJAD BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI having consented to the making and entry of this Judgment without trial, also HEREBY AGREE AS FOLLOWS:

jmt per stip.wpd

MAR 24 2003

11

1 1. This Court has jurisdiction over the subject matter of this litigation and over all
2 parties thereto, pursuant to 28 U.S.C. §1345. The Complaint filed herein states a claim upon
3 which relief can be granted.

4 2. Each defendant hereby acknowledges, and accepts, service of the Complaint
5 filed herein. Each defendant acknowledges and agrees that the facts and allegations made
6 therein are true and correct. Cross-defendant MINOO NEJAD BAKHSH aka M.N.
7 BAKHSH aka MINOO NEJAD REZAI hereby acknowledges, and accepts, service of the
8 Cross-complaint filed herein. Cross-defendant acknowledges and agrees that the facts and
9 allegations made therein are true and correct.

10 3. Each defendant hereby agrees that plaintiff the UNITED STATES OF
11 AMERICA have and recover from defendants HI-TECH DESIGN KITCHEN AND
12 INTERIORS, a California corporation; KAMBAKSH REZAI aka KAMBAKHAH
13 REZAI; and MINOO NEJAD BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI,
14 and each of them, \$58,804.49 principal, \$26,898.79 interest (to March 24, 2003 plus \$6.44
15 *per diem* until date of entry of judgment by the Court), \$3,952.18 attorneys' fees, and
16 \$251.00 costs, for a total of \$89,906.46 (plus additional *per diem* sums). Judgment to
17 accrue interest at the legal rate until paid.

18 4. Cross-defendant MINOO NEJAD REZAI hereby agrees that Judgment be
19 entered in favor of Cross-complainants KAMBAKSH REZAI and HI-TECH DESIGN
20 KITCHEN AND INTERIORS, a California corporation, against Cross-defendant MINOO
21 NEJAD REZAI in the amount of \$89,906.46.

22 5. **Stipulated Post-Judgment Payment Plan.** Unless superseded by the terms
23 of paragraph 5b, the obligation of each of the defendants may be considered satisfied upon
24 completion of timely payments of the compromised amount of \$92,418.09 by defendants
25 as follows:

26 a. Fifty-nine (59) consecutive monthly payments of \$1,540.32 each, due on
27 or before the 24th day of each month commencing March 24, 2003, with
28 a sixtieth (60th) monthly payment due on or before February 24, 2008 in

1 the amount of \$1,539.21.

2 b. The aforesated payment schedule is to be in effect **unless until either**
3 **of the following conditions fail to occur:**

4 (1) Plaintiff and Judgment Creditor United States of America may file
5 its Abstracts of Judgment upon issuance of the Judgment so that in the
6 event *any* real property transaction so encumbered is to take place,
7 payment in full of the entirety of the then unpaid judgment shall be
8 required notwithstanding the payment plan

9 **or**

10 (2) Each and all the Judgment Debtors shall have a continuing
11 obligation to submit to Plaintiff and Judgment Creditor through its
12 counsel on an annual basis no later than thirty days after the due date for
13 filing, a signed copy of the federal tax return of that party plus an
14 original signed and audited financial statement prepared by a Certified
15 Public Accountant, renegotiation or payment in full of the entire unpaid
16 judgment shall be required if in the sole discretion of the Judgment
17 Creditor the financial condition of any judgment debtor leads the
18 Judgment Creditor to determine that continuing the payment plan for
19 another year would not be reasonable.

20 It should be noted that the payment plan is set at merely 1.09% interest on an amortization
21 schedule which is the judgment interest rate in effect March 10, 2003.

22 6. **Stipulation Between Cross-complainants KAMBAKHSH REZAI, etc. and**
23 **HI-TECH DESIGN KITCHEN AND INTERIOR, a California corporation and Cross-**
24 **defendant MINOO NEJAD REZAI.** Cross-complainants KAMBAKHSH REZAI and
25 HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation agree that
26 payments timely tendered to the Plaintiff UNITED STATES OF AMERICA, by Cross-
27 defendant MINOO NEJAD REZAI pursuant to paragraph 5, supra, on the judgment held by
28 Plaintiff shall sequentially reduce the costs, accruing interest, and finally the principal sum

1 on the judgment entered against Cross-defendant MINOO NEJAD REZAI in favor of
2 KAMBAKHKH REZAI and HI-TECH DESIGN KITCHEN AND INTERIORS, a
3 California corporation.

4 **7. Stipulation Between Cross-complainants KAMBAKHSH REZAI, etc. and**
5 **HI-TECH DESIGN KITCHEN AND INTERIOR, a California corporation and Cross-**
6 **defendant MINOO NEJAD REZAI.** In the event Cross-defendant MINOO NEJAD
7 REZAI fails to make payments to the Plaintiff UNITED STATES OF AMERICA, pursuant
8 to paragraph 5, *supra*, and/or Plaintiff and Judgment Creditor otherwise pursues its post-
9 judgment collection remedies to enforce or collect monies from Cross-complainants
10 KAMBAKSH REZAI and/or HI-TECH DESIGN KITCHEN AND INTERIORS, a
11 California corporation, said Cross-Complainants each and all may immediately seek and
12 obtain a writ of possession and writ of execution on their verified application without further
13 notice of hearing, and Cross-complainants may immediately take action to collect all monies
14 then due and owing on the judgment, plus interest and costs accruing from the time of default
15 by Cross-defendant MINOO NEJAD REZAI. Any monies collected by Cross-complainants
16 will first reimburse Cross-complainants' monies collected by Plaintiff United States of
17 America from said Cross-complainants plus costs and attorneys fees actually expended with
18 the balance of monies collected to be tendered to Plaintiff United States America.

19 8. All payments due under this Stipulation are payable to the U.S. Department of
20 Justice. All payments shall be sent to: U.S. Department of Justice, Central Intake Facility,
21 P.O. Box 198558, Atlanta, GA 30384. Each co-defendant's social security number, and
22 "CIF File Nos. C-102-01274; C-102-01275; and C-102-01276" shall be on the front of each
23 check or money order. A copy of each payment shall be delivered by mail or by facsimile
24 to plaintiff's lawyers GOLDSMITH & HULL.

25
26 9. Ardalan & Associates by P. Christopher Ardalan is defendants and cross-
27 complainants HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation
28 and KAMBAKHSH REZAI aka KAMBAKHAH REZAI's counsel in this case. Halpern

1 & Halpern by H. Russell Halpern is defendant and cross-defendant MINOO NEJAD
2 BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI's counsel in this case.
3 Goldsmith & Hull, P.C. by Scott M. Gitlen is Plaintiff's counsel in this case and is
4 authorized to execute this stipulation on behalf of Plaintiff United States of America.
5 Plaintiff's counsel, Defendants' counsel, Cross-complainants' counsel and Cross-defendants'
6 counsel, approve of the form of the Stipulation and join in it. Plaintiff, Defendants, Cross-
7 complainants, and Cross-defendant each voluntarily, knowingly, and intelligently waive their
8 respective due process rights, rights to trial, rights to notice and rights to hearing, and time
9 for appeal, retrial, or for entry of judgment by approving this stipulation for entry of
10 judgment.

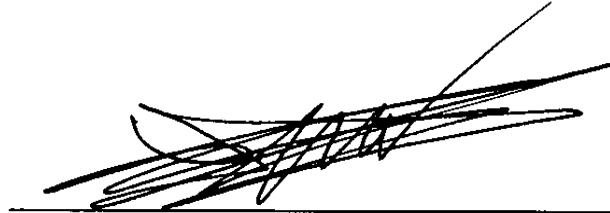
11

12

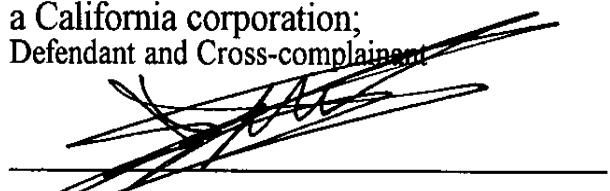
13 STIPULATED AND AGREED BY:

14

15 DATED: 3.29.03.



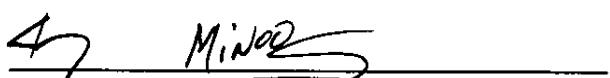
16 HI-TECH DESIGN KITCHEN AND INTERIORS,
17 a California corporation;
18 Defendant and Cross-complainant



19 KAMBAKHSH REZAI aka KAMBAKHAH REZAI
20 Defendant and Cross-complainant

21

22 DATED: 3/20/2003

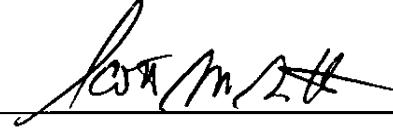


23 MINOO NEJAD BAKHSH aka M.N. BAKHSH
24 aka MINOO NEJAD REZAI
25 Defendant and Cross-defendant

1 APPROVED AS TO FORM AND CONTENT AND SUBMITTED BY:

2 DATED: 3-21-03

3 GOLDSMITH & HULL, P.C.

4 
5 SCOTT M. GITLEN
6 Attorneys for Plaintiff
7 UNITED STATES OF AMERICA

8 DATED: 3/20/03

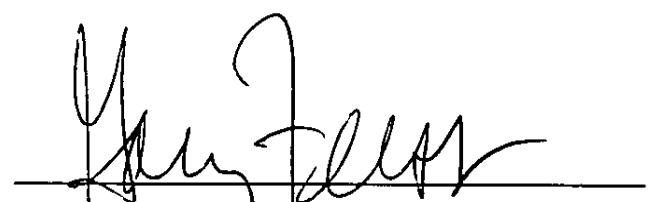
9 ARDALAN & ASSOCIATES
10 
11 P. CHRISTOPHER ARDALAN
12 Attorney for Defendants and
13 Cross-complainants
14 KAMBAKSH REZAI aka
KAMBAKAH REZAI and
HI-TECH DESIGN KITCHEN AND
INTERIORS

15 DATED: 3/20/03

16 HALPERN & HALPERN
17 
18 H. RUSSELL HALPERN
19 Attorneys for Defendant and
20 Cross-defendant
21 MINOO NEJAD BAKHSH aka
M.N. BAKHSH aka MINOO NEJAD REZAI

22
23 CONSENT JUDGMENT ENTERED.

24 DATED: 3/21/03

25 
26 GARY ALLEN FEESS
27 UNITED STATES DISTRICT JUDGE
28

1
2
3 PROOF OF SERVICE
4
5

6 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES
7
8

9 I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party
10 to the within action; my business address is 18425 Burbank Boulevard, Suite 615, Tarzana, CA 91356.

11 On the date set forth below I served the foregoing document described as STIPULATION FOR
12 ENTRY OF CONSENT JUDGMENT on the interested parties in this action by placing a true copy
13 thereof enclosed in a sealed envelope addressed as follows:

14 H. Russell Halpern, Esq.
15 HALPERN & HALPERN
16 18663 Ventura Boulevard, Suite 200
17 Tarzana, CA 91356

18 Attorneys for Defendant
19 Minoo Nejad Bakhsh

20 P. Christopher Ardalan, Esq.
21 ARDALAN & ASSOCIATES
22 15303 Ventura Boulevard #400
23 Sherman Oaks, CA 90403

24 Attorneys for Defendant and Cross-Complainant
25 Kambaksh Rezai aka Kambakkah Rezai
Hi-Tech Design Kitchen and Interior

26 [X] BY MAIL. [] I deposited such envelope, postage thereon fully prepaid, in the United States mail at
27 Tarzana, California.

28 [X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence
1 for mailing. Under that practice it would be deposited with U.S. postal service on that same day with
2 postage thereon fully prepaid at Tarzana, California in the ordinary course of business. I am aware that on
3 motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is
4 more than one day after date of deposit for mailing an affidavit.

5 [] BY PERSONAL SERVICE. I delivered such envelope(s) by hand to the office(s) of the addressee(s).

6 [] STATE. I declare under penalty of perjury, under the laws of the State of California, that the foregoing
7 is true and correct

8 [X] FEDERAL. I declare that I am employed in the office of a member of the bar of this court at whose
9 direction this service was made.

10 Executed on 3/21/03 at Tarzana, California

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

S Helms

